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10 **Attorneys for Defendant**
11 **NEW AMERICAN FUNDING**

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 Mary E. Daniels,

15 Plaintiff,

16 v.

17 Equifax Information Services, LLC; Ally
18 Financial Inc.; Broker Solutions Inc. DBA New
19 American Funding; National Consumer Telecom
20 & Utilities Exchange, Inc; and Verizon
21 Communications Inc.,

22 Defendants.

CASE NO.: 2:21-cv-00337-JAD-EJY
DEPT. NO.:

**STIPULATION TO EXTEND TIME TO
RESPOND TO THE COMPLAINT**

23 The parties, by and through their respective counsel of record, hereby stipulate to extend the
24 time for Defendant Broker Solutions, Inc., dba New American Funding (hereinafter "NAF"), to
25 respond to Plaintiff's Complaint filed on February 26, 2021 (Doc. No. 1.) NAF was served with
26 process on March 1, 2021 and its time to respond is currently March 22, 2021. The parties agree to
27 extend the deadline until April 12, 2021. This is the first stipulation for extension to respond and is

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1 entered into for purposes of engaging in good faith negotiations regarding potential resolution. This
2 request is not for any improper purpose or delay.

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4 DATED: March 19, 2021

WOLFE & WYMAN LLP

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6 By: /s/ Andrew A. Bao

7 ANDREW A. BAO, ESQ.
8 Nevada State Bar No. 10508
9 6757 Spencer St.
10 Las Vegas, NV 89119
11 Attorneys for Defendant
12 **NEW AMERICAN FUNDING**

13
14 DATED: March 19, 2021

KIND LAW

15
16 By: /s/ Michael Kind

17 MICHAEL KIND, ESQ.
18 Nevada State Bar No: 13903
19 8860 South Maryland Parkway, Suite 106
20 Las Vegas, NV 89123
21 Attorneys for Plaintiff
22 **MARY E. DANIELS**

23
24 **IT IS SO ORDERED.**

25 DATED this 19th day of March, 2021.

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ELAYNA J. YOUCHAK
UNITED STATES MAGISTRATE JUDGE